

**Commonwealth of Kentucky  
Natural Resources and Environmental Protection Cabinet  
Department for Environmental Protection  
Division for Air Quality  
803 Schenkel Lane  
Frankfort, Kentucky 40601  
(502) 573-3382**

**STATE ORIGIN  
AIR QUALITY PERMIT  
Issued under 401 KAR 52:040**

**Permittee Name:** Bendix Commercial Vehicle Systems, LLC

**Mailing Address:** 2001 U.S. 421 South  
Frankfort, KY 40601

**Source Name:** Bendix Commercial Vehicle Systems, LLC  
**Mailing Address:** Same as above  
**Source Location:** 2001 U.S. 421 South  
Frankfort, KY 40601

**Source ID #:** 21-073-00031  
**SIC Code:** 3714

**Regional Office** Frankfort Regional Office  
643 Teton Trail, Suite B  
Frankfort, KY 40601-1758  
(502) 564-5043

**County:** Franklin

**Permit Number:** S-03-112  
**Log Number:** 55879  
**Permit Type:** Minor Source (Operation)

**Application**  
**Complete Date:** September 14, 2003  
**Issuance Date:** December 31, 2003  
**Expiration Date:** December 31, 2013

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**John S. Lyons, Director  
Division for Air Quality**

## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify an affected facility without first having submitted a complete application and received a permit for the planned activity from the Division, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS****FF-1A&B (FF-1A&B) Nordson Electrostatic Spray Paint Booth & Conveyor**

**Description:** This emission unit is a 17' x 15', Nordson Electrostatic Spray Paint Booth & Conveyor with 3 automatic, air spray guns. Airbrake compressor parts are fed via a conveyor. The spray guns are automated by equipment that senses the location of part in the booth as the parts travel through the booth on the conveyor. Rated capacity of the booth is 1.8 gallons of coating per hour. Construction commenced in 1979. Water wall particulate control is used.

**APPLICABLE REGULATIONS:**

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR, commenced on or after July 2, 1975.

**1. Operating Limitations:**

At all times when spraying, the water wall shall be maintained and operated according to manufacturer's specifications and recommendations.

**2. Emission Limitations:****401 KAR 59:010**

(1) Section 3(1)(a) limits visible emissions to less than 20% opacity.

(2) Section 3(2) limits emissions of particulate matter from each booth stack to a maximum of 2.34 lbs/hr.

**Compliance Demonstration Method:**

A) See **4. Monitoring Requirements**

B) See **5. Recordkeeping Requirements**

**3. Testing Requirements:**

(1) If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 5 and 9.

(2) Water wall demonstration of compliance: If deemed necessary, the Cabinet may require testing using either EPA Method 201, or EPA Method 202, or EPA Method 17 as appropriate.

**4. Monitoring Requirements:**

The permittee shall monitor the water flowrate continuously.

**5. Recordkeeping Requirements:**

The permittee shall record the water flow rate once per shift when the booth is in operation.

**6. Reporting Requirements:**

N/A

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)****FF-11B (FF-11B) Anodizing Chrome Tank****FF-11C (FF-11C) Flash Dry Tank**

**Description:** These emission units consist of (1) plating, (3) rinse tanks, plus wastewater treatment, and precipitation tanks used for an anodizing chrome plating process. Aluminum and Zinc parts are plated. Construction commenced in 1992. Hexavalent chrome is converted to trivalent chrome in the waste treatment process.

**APPLICABLE REGULATIONS:**

Regulation **401 KAR 63:020**, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality.

**1. Operating Limitations:**

N/A

**2. Emission Limitations:**

N/A

**3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

**4. Monitoring Requirements:**

N/A

**5. Recordkeeping Requirements:**

N/A

**6. Reporting Requirements:**

N/A

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**FF-10B&C** (FF-10B&C) Acme Fab Parts Washer, (2) Burners (1500 MBTU/hr each)  
**FF-12B&C** (FF-12B&C) Aluminum Washer, (2) Burners (1500 MBTU/hr each)  
**FF-16B** (FF-16B) New Gen Washer, (1) Burner (1500 MBTU/hr)  
**FF-20A** (FF-20A) Monster Washer, (1) Burner (1500 MBTU/hr)

**Description:**

Acme Fab Parts Washer, (AF0718) with two (2) natural gas fired heating elements rated at 1,500,000 Btu/hr each. One burner is for the wash side and one burner is for the rinse side. Construction commenced in 1974.

Cincinnati Aluminum Washer, (CW1232) with two (2) natural gas fired heating elements rated at 1,500,000 Btu/hr each. One burner is for the wash side and one burner is for the rinse side. Construction commenced in 1992.

Continental New Gen Washer, (CO0376) with one (1) natural gas fired heating element rated at 1,500,000 Btu/hr. Construction commenced in 1991.

Monster Washer, with one (1) natural gas fired heating element rated at 1,500,000 Btu/hr. Construction commenced in 1998.

**APPLICABLE REGULATIONS:**

Regulation **401 KAR 59:015**, applicable per Section 2 (1); "Affected facility" means an indirect heat exchanger having a heat input capacity of more than one (1) million BTU per hour. Regulation is applicable to each affected facility commenced on or after April 9, 1972 with respect to particulate emissions and sulfur dioxide emissions, [Section 2 (3) (b)].

**1. Operating Limitations:**

Heating equipment shall continue to use natural gas.

**2. Emission Limitations:****401 KAR 59:015**

- (1) Section 4(1)(a) limits emissions of particulate matter to (0.56) pounds per million BTU actual heat input.
- (2) Section 5(1) (a) limits emissions of sulfur dioxide to (3.0) pounds per million BTU actual heat input.

**Compliance Demonstration Method:**

Observance of **Operating Limitations** above shall constitute compliance.

**3. Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

**4. Monitoring Requirements:**

N/A

**5. Recordkeeping Requirements:**

N/A

**6. Reporting Requirements:**

## SECTION C - GENERAL CONDITIONS

### A. Administrative Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
3. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 11]
4. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 4,5]
5. This permit does not convey property rights or exclusive privileges. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].
6. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 52:040 Section 11(3)]
7. All previously issued permit to this source at this location are hereby null and void.

**SECTION C - GENERAL CONDITIONS (CONTINUED)****B. Recordkeeping Requirements**

1. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 52:040 Section 3(1)(f)]
2. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

**C. Reporting Requirements**

1. a. In accordance with the provisions of 401 KAR 50:055, Section 1 the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
  - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
  - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request.
- b. The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition 1 a) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report. [Material incorporated by reference by 401 KAR 52:040, Section 5, 3].
2. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the permit. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].
3. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

The summary reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21. All deviations from

permit requirements shall be clearly identified in the reports.

## **SECTION C - GENERAL CONDITIONS (CONTINUED)**

### **D. Inspections**

1. In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
  - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
  - b. To access and copy any records required by the permit;
  - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
  - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

### **E. Emergencies/Enforcement Provisions**

1. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Material incorporated by reference by 401 KAR 52:040, Section 1a, 3].
2. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
  - a. An emergency occurred and the permittee can identify the cause of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
3. Emergency provisions listed in General Condition E.2 are in addition to any emergency or upset provision contained in an applicable requirement.
4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.



**SECTION C - GENERAL CONDITIONS (CONTINUED)****F. Compliance**

1. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
  - a. Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
  - b. All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and non routine maintenance performed on each control device.
  - c. A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division.
2. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:
  - a. Identification of the term or condition;
  - b. Compliance status of each term or condition of the permit;
  - c. Whether compliance was continuous or intermittent;
  - d. The method used for determining the compliance status for the source, currently and over the reporting period, and
  - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
  - f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality Frankfort Regional Office 643 Teton Trail Frankfort, KY 40601-1578	Division for Air Quality Central Files 803 Schenkel Lane Frankfort, KY 40601-1403
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3. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
  - (a) Applicable requirements that are included and specifically identified in this permit; or
  - (b) Non-applicable requirements expressly identified in this permit.

**SECTION C - GENERAL CONDITIONS (CONTINUED)****G. Construction Requirements:**

N/A

**SECTION D - INSIGNIFICANT ACTIVITIES**

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Office Boiler (500MBTU/hr)	
2. Machining Water Heater (199MBTU/hr)	
3. Assembly Water Heater (199MBTU/hr)	
4. Acme Fab Parts Washer	
5. Alkaline wash tank	
6. Heat Cure Tank	
7. Impregnation Vessel	
8. Aluminum Washer	
9. Lab Hood	
10. New Gen Washer	
11. Waste Coolant Tanks	
12. Monster Washer	